

## UNITED STATES DISTRICT COURT

for the

District of

Division

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APR 07 2022

U.S. DISTRICT COURT

Redmond J. Howard  
Terra-Lynn Howard  
Marion Gabriel

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

*Additional Defendants:*  
*Calebence*  
*Senshuma*

Glenwood Apartments

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Case: 2:22-cv-00248

Assigned To : Bennett, Jared C.

Assign. Date : 4/7/2022

Description: Howard v Glenwood Apartments et al

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Redmond J. Howard
Street Address	17 Field Road
City and County	Maplewood, Somerset
State and Zip Code	New Jersey, 07040
Telephone Number	385-895-1975
E-mail Address	

*redmondjameshoward@gmail.com*

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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## Defendant No. 1

Name	Glenwood Apartments (Kirk A. Cullimore, [re Service])
Job or Title <i>(if known)</i>	Apartment Complex to Be Non-BYU Approved
Street Address	12339 S 800 E
City and County	Draper, Utah County
State and Zip Code	84020
Telephone Number	801-374-9090
E-mail Address <i>(if known)</i>	info@cullimore.net

## Defendant No. 2

Name	Cole Beebe
Job or Title <i>(if known)</i>	
Street Address	1505 N UNIVERSITY AVE, APT. 135
City and County	PROVO, UTAH COUNTY
State and Zip Code	UT, 84604
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	Sara Shumway
Job or Title <i>(if known)</i>	
Street Address	1505 N UNIVERSITY AVE, APT. 135
City and County	PROVO, UTAH COUNTY
State and Zip Code	UT, 84604
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The plaintiff respectfully DEMANDS that an INJUNCTION is GRANTED as the plaintiff complains against slander/libel against the defendant. The plaintiff had expressed verbally and in-writing that what the defendants allege and claim as true are untrue. There is noncompliance.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* Redmond Howard, is a citizen of the State of *(name)* New Jersey.

## b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)* and has its principal place of business in the State of *(name)*.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)*, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

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b. If the defendant is a corporation

The defendant, (name) Glenwood Apartments, is incorporated under the laws of the State of (name) Utah, and has its principal place of business in the State of (name) Utah.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

N/A

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

As of this filing, the events had given rise at Glenwood Apartments

B. What date and approximate time did the events giving rise to your claim(s) occur?

The date and approximate time the events giving rise to the plaintiff's claim are ongoing.

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

The plaintiff is alleging slander/libel against the defendant. The plaintiff claims that Glenwood Apartments [Defendant] willingly commits slander/libel against the plaintiff. There are false claims that the plaintiff had unlawfully obtained a bicycle, scooter, clothing, and other property unlawfully. The plaintiff had obtained clothing from local neighbors and local entities that give away clothing. The plaintiff had not lawfully obtained all other items unlawfully. Concerning hygiene, the plaintiff highly prioritizes hygiene and had bathed twice due to the State of Utah's hot weather and ongoing work hours. This has been consistent; the plaintiff had respectfully requested that his cotenants please stop alleging bad hygiene. The cotenants and apartment complex had refused. As a result, the plaintiff alleges slander/libel against the defendants and his cotenants. Notice was given verbally and in-writing.

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#### **IV. Irreparable Injury**

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Irreparable injuries are not applicable at this time.

#### **V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The plaintiff respectfully DEMANDS that Glenwood Apartments please stop stating this slanderous and libelous nature against the PLAINTIFF. The plaintiff AFFIRMS that the plaintiff bathes twice a day and prioritizes hygiene. This was expressed within Glenwood Apartments. The plaintiff AFFIRMS that clothing in the unit was obtained either through third-parties as gifts or from local entities that give away clothing. The plaintiff AFFIRMS that any bikes, scooters, and other property are not in the unit as of this filing and not obtained unlawfully. Also, the plaintiff respectfully DEMANDS that Glenwood Apartments completely rids all documents and further affiliations with the plaintiff in its file.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/07/2022

Signature of Plaintiff



Printed Name of Plaintiff

Redmond J. Howard

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address